# IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS BROWNSVILLE DIVISION

STATE OF TEXAS;	)
STATE OF ALABAMA;	)
STATE OF GEORGIA;	)
STATE OF IDAHO;	)
STATE OF INDIANA;	)
STATE OF KANSAS;	)
STATE OF LOUISIANA;	)
STATE OF MONTANA;	)
STATE OF NEBRASKA;	)
STATE OF SOUTH CAROLINA;	)
STATE OF SOUTH DAKOTA;	)
STATE OF UTAH;	)
STATE OF WEST VIRGINIA;	)
STATE OF WISCONSIN;	)
GOVERNOR PHIL BRYANT, State of Mississippi;	)
GOVERNOR PAUL R. LEPAGE, State of Maine;	)
GOVERNOR PATRICK L. McCrory, State of North Carolina; and	)
GOVERNOR C.L. "BUTCH" OTTER, State of Idaho,	)
Plaintif	) fs, )
vs.	) Case No. 1:14-cv-254

UNITED STATES OF AMERICA;	)
JEH JOHNSON, Secretary of the Department of Homeland Security;	)))
R. GIL KERLIKOWSKE, Commissioner of U.S. Customs and Border Protection;	)))
RONALD D. VITIELLO, Deputy Chief of U.S. Border Patrol, U.S. Customs and Border Protection;	)))
THOMAS S. WINKOWSKI, Acting Director of U.S. Immigration and Customs Enforcement; and	)))
LEÓN RODRÍGUEZ, Director of U.S. Citizenship and Immigration Services,	)))
Defendants.	)

## PLAINTIFFS' MOTION TO EXCEED PAGE LIMITS

Plaintiffs respectfully ask the Court for permission to exceed the 20-page limit by 13 pages in their Motion For Preliminary Injunction. Plaintiffs' motion raises complex issues in a case of national importance, and Plaintiffs need these extra pages to adequately present these issues to the Court. The United States does not oppose this motion.

## **CONCLUSION**

Plaintiffs' motion to exceed the page limit should be granted.

Respectfully submitted.

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#### CERTIFICATE OF CONFERENCE

I certify	that I	conferred	with	counsel	for	the	Defendants	and	they	do	not	oppose
this motion	on.											

\_\_/s/ Andrew S. Oldham\_\_\_\_\_ Andrew S. Oldham

#### **CERTIFICATE OF SERVICE**

I certify that I served a copy of this motion on the following counsel for the Defendants via federal express, next day service:

Adam D. Kirschner Trial Attorney U.S. Department of Justice Civil Division, Federal Programs Branch 20 Massachusetts Ave., NW, Room 7126 Washington D.C. 20001

Counsel for Defendants

\_\_/s/ Andrew S. Oldham\_\_\_\_\_ Andrew S. Oldham